

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CAIR FOUNDATION, INC., d/b/a
COUNCIL ON AMERICAN-ISLAMIC
RELATIONS, & CAIR,

Plaintiff,

v.

LORI SAROYA,

Defendant.

Civil No.: 0:21-cv-01267 (SRN/TNL)

**STATEMENT REGARDING
CONFIDENTIALITY RELATING TO
EXHIBITS 1 AND 2 TO THE
DECLARATION OF STEVEN C.
KERBAUGH PURSUANT TO MINN.
L.R. 5.6(d)(1)(A)(ii)**

Defendant Lori Saroya (“Saroya”) submits the following Statement Regarding Confidentiality pursuant to Minn. L.R. 5.6(d)(1)(A)(ii). Saroya submits Exhibits 1 and 2 to the Declaration of Steven C. Kerbaugh in Support of Defendant Lori Saroya’s Motion for Declaration that No Privilege Exists with Respect to a 2014 Report Provided by CAIR to Her, that any Privilege has Been Waived, or that She May Use the Report to Present Facts in the Report in Her Defense under seal. Saroya does not believe that this document is confidential or properly sealed. However, in order to give Plaintiff the opportunity to make whatever argument it wishes regarding the confidentiality of these documents, Saroya is filing them under temporary seal in the present filing. Under the circumstances, it would be impracticable to file Exhibits 1 and 2 in redacted form.

Dated: November 23, 2021

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